

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 APR 15 P 2:51

DISTRICT COURT
DISTRICT OF MASS.

CAROLYN GREENE, on Behalf of Herself and
All Others Similarly Situated,

Plaintiff,

v.

Civ. No. 1:03 CV 12628 (NG)

BIOPURE CORPORATION, THOMAS A.
MOORE, CARL W. RAUSCH and RONALD F.
RICHARDS,

Defendants.

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3, the undersigned counsel, David Pastor, hereby moves the Court to enter an Order granting leave to Sean M. Handler of the law firm of Schifffrin & Barroway, LLP to appear on behalf of the plaintiff and practice before this Court in the above-entitled civil action.

As grounds for this motion, the undersigned represents the following:

1. Mr. Handler has been a member in good standing of the bar of Pennsylvania since 2000.
2. There are no disciplinary proceedings against Mr. Handler as a member of the bar in any jurisdiction.
3. Mr. Handler has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. In further support of this motion, Mr. Handler has submitted herewith his Certification for Admission Pro Hac Vice as required by Local Rule 83.5.3.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Undersigned counsel has conferred with counsel for the defendants who have indicated that the defendants assent to the relief sought by this Motion.

Dated: April 14, 2004

Respectfully submitted,



David Pastor (BBO # 391000)
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Plaintiff's Counsel

CERTIFICATE OF SERVICE

I Hereby Certify That A True Copy of
The Above Document Was Served Upon
The Attorney Of Record For Each Other

Party By Mail (By Hand) On 4/14/04